

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

JANE DOE, *proceeding by pseudonym*

Plaintiff,

v.

**SIGMA CHI INTERNATIONAL FRATERNITY,
INCORPORATED, et al.**

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**Civ. Action No.:
5:23-cv-1452 (BKS/ML)**

**JOINT MOTION FOR ENTRY OF PROPOSED CONSENT PROTECTIVE ORDER
AND CONFIDENTIALITY AGREEMENT**

The parties to the above-captioned case (together, the “Parties”), by and through their undersigned counsel of record and pursuant to Federal Rule of Civil Procedure 26(c), jointly and respectfully move this Court to enter the proposed Consent Protective Order and Confidentiality Agreement (“Protective Order”) attached hereto as **Exhibit 1**.

The Parties acknowledge and agree that discovery in the above-styled action will involve the production or disclosure of documents, materials, information, and/or testimony concerning and/or containing confidential, proprietary, personal health, personal, and/or FERPA-protected information. Prior to filing this Motion, the Parties stipulated and agreed to the form and substance of a Protective Order regarding such information. Accordingly, the Parties respectfully request that this Court enter the proposed Protective Order attached hereto as **Exhibit 1**.

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Dated: January 29, 2024

Respectfully submitted,

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